

**REMARKS**

Claims 1-10, 13, 17-26, 28-76 and 78-101 are pending in the application.

Claims 1-10, 13, 17-26, 28-76 and 78-101 have been rejected.

Claims 1, 13, 17, 19, 21, 22, 39, 46, 54, 55, 58, 59, 64, 66, 67, 84, and 85 have been amended.

Claim 38 has been cancelled.

*Rejection of Claims under 35 U.S.C. § 103(a)*

Claims 1-10, 13, 17-22, 24-26, 28-42, 45-56, 58-64, 66-76 and 78-101 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,332,154 issued to Beck, et al. ("Beck") in view of U.S. Patent No. 7,092,509 issued to Mears, et al. ("Mears") and further in view of U.S. Publication No. 2004/0031030 issued to Kidder, et al. ("Kidder"). To the extent that they might be applied against the amended claims, Applicants respectfully traverse each of these rejections. Applicants respectfully submit that the arguments presented below with respect to independent claim 1 are generally applicable to claims 13, 17, 19, 21, 22, 39, 46, 54, 59, 67, 84 and 85, as well as the claims that depend therefrom, as independent claims 13, 17, 19, 21, 22, 39, 46, 54, 59, 67, 84 and 85 generally require the same disputed limitations of claim 1. Exemplary claim 1 recites:

A method comprising:  
 obtaining an event communicated to a communication server via an incoming communication channel of a plurality of communication channels, wherein the communication server is communicatively coupled to the plurality of communication channels via a plurality of channel drivers,  
 each communication channel of the communication channels has a media type,  
 at least two communication channels of the communication channels have different media types, and  
 the event corresponds to a work item available via the incoming communication channel;  
 providing a notification of the work item via a user interface, wherein the user interface comprises a web browser;

receiving an activation of a work item object of the user interface, wherein  
     the work item object is associated with the work item,  
     the activation of the work item object is associated with selecting one  
         communication channel of the plurality of communication channels, and  
     the work item object is activated by an agent;  
 identifying one or more parameters associated with a command, wherein  
     the command is associated with the activation of the work item object, and  
     the identifying the command comprises the communication server accessing a  
         command parameter table;  
 identifying a channel driver, wherein  
     the channel driver is configured to execute the command, and  
     the identifying the channel driver comprises the communication server accessing  
         a command table; and  
 causing the channel driver to issue the command from the communication server to an  
     outgoing communication channel of the communication channels.

Applicants respectfully submit that the proposed combination of references fails to disclose the claimed feature of “obtaining an event communicated to a communication server.” As an initial matter, support for this amendment is found, at least, at the Specification, p. 6, l. 30-p. 7, l. 3. The claimed feature recites a communication server at which events from a plurality of media channels arrive, wherein the media channels have at least two different media types. The Office Action states that Beck column 13, lines 45-60 discloses “an incoming transaction, such as a live call, an email, etc., is received at the appropriate CTI switch (COST) or routing server (DNT) in a CINOS communication center such as center 17.” Office Action, p. 3. However, Applicants note that the cited passage does not disclose events from multiple channels of differing media types arriving at the same communication server. Instead, the cited passage discloses that COST calls and DNT calls are received at separate, different systems (i.e. a CTI switch versus a routing server). At least for the reason that the cited portions of Beck disclose different types of calls being received by different entities, Applicants respectfully submit that the cited portions of Beck fail to disclose receiving an event at a server communicatively coupled to a plurality communication channels having different media types.

Applicants respectfully submit that the proposed combination of references fail to disclose the claimed feature “the communication server is communicatively coupled to the plurality of communication channels via a plurality of channel drivers.” As an initial matter, support for this amendment is found, at least, at the Specification, p. 6, l. 30-p. 7,

l. 3. As discussed above, the proposed combination of references fails to disclose a communication server that receives events from a plurality of communication channels. It follows that the proposed combination of references fails to disclose that the communication server is communicatively coupled to the communication channels at all, much less via a plurality of channel drivers.

Applicants respectfully submit that the proposed combination of references also fails to disclose the claimed feature of “wherein the user interface comprises a web browser.” As an initial matter, support for this amendment is found, at least, at the Specification, page 7, lines 14-20. As discussed at the Specification, one of the problems of the prior art, for example Beck, Mears, and Kidder, taken alone or in combination, is that interacting with customers via different communication channels of different media types requires different software and interfaces. This lack of uniformity with regard to customer interactions leads to reduced efficiency in handling these interactions. *See, e.g.*, Specification, page 2, line 28-page 2, line 11. The claimed feature of a user interface comprising a web browser enables an agent to view and manage work items for all channels in a single, uniform, interface. This uniformity contributes to increased efficiency.

Applicants respectfully submit that the proposed combination of references fails to disclose the claimed feature of “identifying one or more parameters associated with a command, wherein...the identifying the command comprises the communication server accessing a command parameter table.” As an initial matter, support for this amendment is found, at least, at the Specification, page 40, lines 18-19 (“Session mode communication server 110 obtains the parameters necessary for the command from a command parameter table.”) The Office Action admits that Beck fails to disclose identifying a command wherein the identifying comprises accessing a table. Office Action, p. 4. The Office Action cites Mears’ Table 41 and column 57, lines 15-35 as purportedly supplying this missing disclosure. Office Action, p. 5. However, Applicants respectfully submit that the cited table is merely intended to describe information in Mears’ patent application, and that the cited portions of Mears fail to disclose that this table is accessed in any way, much less by a communication server.

Furthermore, Applicants have amended claim 1 to recite identifying command parameters wherein the identifying comprises a communication server accessing a command parameter table. Applicants respectfully submit that the cited table is not comparable to the claimed command parameter table, at least because the cited table fails to disclose parameters associated with a command. Instead, the table merely describes items of a web collaboration window. Accordingly, Applicants respectfully submit that the cited passages of Beck and Mears fail to disclose identifying one or more parameters associated with a command, wherein the identifying comprises a communication server accessing a command parameter table.

Applicants respectfully submit that the proposed combination of references fail to disclose the claimed feature of “the identifying the channel driver comprises the communication server accessing a command table.” As an initial matter, support for this amendment is found, at least, at the Specification, page 40, lines 16-18 (“The command table CMD (Fig. 2r), the channel driver table CNCTR (Fig. 2a), and the configuration table CFG (Fig. 2n) are examples of tables that can be used by session mode communication server 110 to determine the channel driver 120 associated with the command.”) The Office Action admits that Beck fails to disclose identifying a channel driver wherein identifying the channel driver comprises accessing a command table. The Office Action cites Kidder’s ¶ [0489] as purportedly supplying this missing disclosure. However, the cited portions of Kidder do not disclose a communications server accessing a command table to identify a channel driver. ¶ [0489] of Kidder merely discloses that applications access tables and data within a new configuration database. Referring to Kidder’s ¶ [0432], Kidder discloses that “[e]ach process, for example, applications and device drivers, use tables in the configuration database to derive names of other configurable objects...” Thus, even if the cited portions of Kidder were to disclose device drivers accessing a configuration table, (a point Applicants do not concede), the cited portions of Kidder would still fail to disclose a communication server accessing a command table to identify a channel driver.

In addition to the failure of the proposed combination of references to disclose each element of Applicants’ claims, Applicants respectfully submit that the Office Action fails to provide a proper motivation to combine the references. For example, the Office

Action states that one of ordinary skill in the art would be motivated to combine Mears with Beck to provide “a contact center system capable of efficiently and effectively handling different types of media contacts.” Office Action, p. 5. However, earlier portions of the Office Action cite Beck as providing a communication center that handles communication channels of different media types. See, Office Action, p. 3. If, as the Office Action contends, Beck discloses handling different types of media, it does not make sense to attempt to combine Mears with Beck in order to handle different types of media, as proposed by the Office Action. It is unclear how attempting to add Mears’ disclosure of a command table provides any improvement to Beck, which (according to the Office Action) already capable of executing commands and handling interactions of a plurality of media types.

Applicants respectfully submit that the Office Action also fails to provide proper motivation to combine Kidder with Beck and Mears. The Office Action states that one of ordinary skill would have been motivated to combine the references to “facilitate hot upgrades of software components within a telecommunications network device.” Office Action, p. 6. Applicants respectfully submit that the Office Action fails to point to any indication that this presents an improvement to a proposed combination of Beck and Mears. Applicants further submit that it is unclear that one of ordinary skill could successfully combine Kidder with Beck and Mears. Kidder relies upon software programs utilizing signatures, and both Beck and Mears fail to disclose any teachings likely to be compatible with Kidder’s signatures.

For at least the foregoing reasons, Applicants respectfully request the Examiner’s reconsideration and withdrawal of the rejection of claim 1 and an indication of the allowability of same. For similar reasons Applicants request the reconsideration and withdrawal of the rejections of independent claims 13, 17, 19, 21, 22, 39, 46, 54, 59, 67, 84 and 85. For at least the reason that all remaining rejected claims are dependent upon independent claims 1, 13, 17, 19, 21, 22, 39, 46, 54, 59, 67, 84 and 85, Applicants request the reconsideration and withdrawal of this rejection against all remaining rejected claims.

Claims 23, 43, 44, 57 and 65 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Beck, Mears and Kidder further in view of U.S. Patent No. 6,587,556 issued to Judkins, et al (“Judkins”). Applicants respectfully traverse this rejection. Claims

23, 43, 44, and 57 and 65 depend, respectively, upon allowable base claims 2, 39, 54, and 59. Therefore, Applicants respectfully assert that these claims are likewise allowable, at least by virtue of depending from allowable base claims.

### **CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5092.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

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